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8-21-03

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397  
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

(217) 782-6761



August 21, 2003

CERTIFIED MAIL

7002 3150 0000 1222 8173

Bruce Hazelgrove, Vice President  
Ethyl Corporation  
330 South Fourth Street  
Richmond, VA 23219

Re: 1630455267—St. Clair County  
East St. Louis/Ethyl Corporation  
950 Victory Avenue  
Site Remediation Program/Technical Reports

Dear Mr. Hazelgrove:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the reports entitled *Phase I Environmental Site Assessment* and *Focused Site Investigation Work Plan* dated July 16, 2003 and August 8, 2003, respectively. The reports were received by the Illinois EPA on August 13, 2003 (Illinois EPA Log No. 03-4034). The reports were prepared by The Forrester Group.

The documents referenced above are approved with the following condition:

1. Section 2.2.2 of the *Focused Site Investigation Work Plan* states that at four (4) locations in the grid, a sample will be collected from the 0" – 12" interval, composited, and analyzed for TCLP lead for waste characterization purposes. At this time, the Illinois EPA requests that at least eight (8) additional (12 total) TCLP samples be analyzed (in 12 of the 24 proposed sampling cells) to determine if lead in soil exhibits the characteristics of toxicity for hazardous waste in accordance with 35 Illinois Administrative Code 742.305(e). Furthermore, one (1) of these TCLP lead samples should be collected from the area where total lead was reported at 11,000 mg/kg (A08) in the February 27, 2002 United States Environmental Protection Agency document included in the *Phase I Environmental Assessment* document.

All future submittals to the Illinois EPA should include three (3) copies of each document.

ROCKFORD – 4302 North Main Street, Rockford, IL 61103 – (815) 987-7760 • DES PLAINES – 9511 W. Harrison St., Des Plaines, IL 60016 – (847) 294-4000  
ELGIN – 595 South State, Elgin, IL 60123 – (847) 608-3131 • PEORIA – 5415 N. University St., Peoria, IL 61614 – (309) 693-5463  
BUREAU OF LAND - PEORIA – 7620 N. University St., Peoria, IL 61614 – (309) 693-5462 • CHAMPAIGN – 2125 South First Street, Champaign, IL 61820 – (217) 278-5800  
SPRINGFIELD – 4500 S. Sixth Street Rd., Springfield, IL 62706 – (217) 786-6892 • COLLINSVILLE – 2009 Mall Street, Collinsville, IL 62234 – (618) 346-5120  
MARION – 2309 W. Main St., Suite 116, Marion, IL 62959 – (618) 993-7200

The Illinois EPA requests a fourteen (14) day, at a minimum, advance notice of any remedial activities at the Remedial Site so Agency personnel can schedule site visits during those activities.

If you have any questions, please feel free to contact me at (217) 557-1409 or e-mail me at [todd.hall@epa.state.il.us](mailto:todd.hall@epa.state.il.us).

Sincerely,



Todd Hall, Project Manager  
Voluntary Site Remediation Unit B  
Remedial Project Management Section  
Division of Remediation Management  
Bureau of Land

@cc: The Forrester Group  
Attn: Matt Shurtliff  
500 Chesterfield Center, Suite 300  
Chesterfield, MO 63017

United States Environmental Protection Agency  
Attn: Dion Novak, RPM  
77 West Jackson Boulevard  
Chicago, IL 60604-3507